

# EXHIBIT B

## Jack R. Wilson

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**From:** Ducker, Phil <Phil.Ducker@alston.com>  
**Sent:** Tuesday, May 21, 2024 9:33 AM  
**To:** Scott Flanz; IDG.Lenovo.ITC  
**Cc:** jennifer.dienes@usitc.gov; [Service] Lenovo-InterDigital ITC  
**Subject:** RE: Inv. No. 337-TA-1373 - De-designation of Non-confidential Portion of Transcript

Scott,

The Bordes Dep. Tr. at 189:17–196:8 does not contain InterDigital's Confidential Business Information.

Best,

Phil

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**From:** Scott Flanz <flanz@fr.com>  
**Sent:** Monday, May 20, 2024 1:33 PM  
**To:** Ducker, Phil <Phil.Ducker@alston.com>; IDG.Lenovo.ITC <IDG.Lenovo.ITC@alston.com>  
**Cc:** jennifer.dienes@usitc.gov; [Service] Lenovo-InterDigital ITC <ServiceLenovo-InterDigitalITC@fr.com>  
**Subject:** RE: Inv. No. 337-TA-1373 - De-designation of Non-confidential Portion of Transcript

**EXTERNAL SENDER – Proceed with caution**

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Phil,

Per your email below, please confirm today that Bordes Dep. Tr. at 189:17–196:8 does not contain any confidential business information. Otherwise, please provide your availability to meet and confer regarding this issue tomorrow so that Respondents can move to de-designate this testimony if necessary.

Sincerely,  
Scott Flanz

**Scott M Flanz**  
Principal ■ Fish & Richardson P.C.  
7 Times Square, 20th Floor, New York, NY 10036  
T: 212 641 2305 F: 212 258 2291  
[flanz@fr.com](mailto:flanz@fr.com) | [Bio](#) | [LinkedIn](#) | [fr.com](#)

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**From:** Ducker, Phil <[Phil.Ducker@alston.com](mailto:Phil.Ducker@alston.com)>  
**Sent:** Friday, May 17, 2024 6:01 AM  
**To:** Scott Flanz <[flanz@fr.com](mailto:flanz@fr.com)>; IDG.Lenovo.ITC <[IDG.Lenovo.ITC@alston.com](mailto:IDG.Lenovo.ITC@alston.com)>  
**Cc:** [jennifer.dienes@usitc.gov](mailto:jennifer.dienes@usitc.gov); [Service] Lenovo-InterDigital ITC <[ServiceLenovo-InterDigitalITC@fr.com](mailto:ServiceLenovo-InterDigitalITC@fr.com)>  
**Subject:** RE: Inv. No. 337-TA-1373 - De-designation of Non-confidential Portion of Transcript

Scott,

We are busy finalizing opening expert reports as I'm sure your team is as well. We are not available to meet and confer on this issue this week. However, we will review your request and provide our position on Monday.

Thanks.

Phil

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**From:** Scott Flanz <[flanz@fr.com](mailto:flanz@fr.com)>  
**Sent:** Thursday, May 16, 2024 10:08 AM  
**To:** Ducker, Phil <[Phil.Ducker@alston.com](mailto:Phil.Ducker@alston.com)>; IDG.Lenovo.ITC <[IDG.Lenovo.ITC@alston.com](mailto:IDG.Lenovo.ITC@alston.com)>  
**Cc:** [jennifer.dienes@usitc.gov](mailto:jennifer.dienes@usitc.gov); [Service] Lenovo-InterDigital ITC <[ServiceLenovo-InterDigitalITC@fr.com](mailto:ServiceLenovo-InterDigitalITC@fr.com)>  
**Subject:** RE: Inv. No. 337-TA-1373 - De-designation of Non-confidential Portion of Transcript

**EXTERNAL SENDER – Proceed with caution**

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Phil,

As requested last Tuesday, please confirm that Bordes Dep. Tr. at 189:17–196:8 does not contain any confidential business information? Otherwise, please provide your availability to meet and confer regarding this issue tomorrow (10-days after Respondents' initial request) so that Respondents can move to de-designate this testimony on Monday if necessary.

Sincerely,  
Scott

**Scott M Flanz**  
Principal ■ Fish & Richardson P.C.  
7 Times Square, 20th Floor, New York, NY 10036  
T: 212 641 2305 F: 212 258 2291  
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**From:** Scott Flanz <[flanz@fr.com](mailto:flanz@fr.com)>  
**Sent:** Monday, May 13, 2024 3:53 PM  
**To:** Ducker, Phil <[Phil.Ducker@alston.com](mailto:Phil.Ducker@alston.com)>; IDG.Lenovo.ITC <[IDG.Lenovo.ITC@alston.com](mailto:IDG.Lenovo.ITC@alston.com)>  
**Cc:** [jennifer.dienes@usitc.gov](mailto:jennifer.dienes@usitc.gov); [Service] Lenovo-InterDigital ITC <[ServiceLenovo-InterDigitalITC@fr.com](mailto:ServiceLenovo-InterDigitalITC@fr.com)>  
**Subject:** RE: Inv. No. 337-TA-1373 - De-designation of Non-confidential Portion of Transcript

Phil,

Following up on the below request.

Sincerely,  
Scott Flanz

**Scott M. Flanz**  
Principal  
**Fish & Richardson P.C.**  
Times Square Tower | New York | NY | 10036  
T: [212.641.2305](tel:212.641.2305) | F: [212.258.2291](tel:212.258.2291)  
[scott.flanz@fr.com](mailto:scott.flanz@fr.com)

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**From:** Scott Flanz <[flanz@fr.com](mailto:flanz@fr.com)>  
**Sent:** Tuesday, May 7, 2024 11:38 AM  
**To:** Ducker, Phil <[Phil.Ducker@alston.com](mailto:Phil.Ducker@alston.com)>; IDG.Lenovo.ITC <[IDG.Lenovo.ITC@alston.com](mailto:IDG.Lenovo.ITC@alston.com)>  
**Cc:** [jennifer.dienes@usitc.gov](mailto:jennifer.dienes@usitc.gov); [Service] Lenovo-InterDigital ITC <[ServiceLenovo-InterDigitalITC@fr.com](mailto:ServiceLenovo-InterDigitalITC@fr.com)>  
**Subject:** RE: Inv. No. 337-TA-1373 - De-designation of Non-confidential Portion of Transcript

Phil,

Can you also please confirm the following testimony does not contain any confidential business information by Friday? The citation is to the final version of the transcript.

Bordes Dep. Tr. at 189:17–196:8.

Sincerely,  
Scott Flanz

Scott M. Flanz  
Principal  
Fish & Richardson P.C.  
Times Square Tower | New York | NY | 10036  
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[scott.flanz@fr.com](mailto:scott.flanz@fr.com)

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**From:** Scott Flanz <[flanz@fr.com](mailto:flanz@fr.com)>  
**Sent:** Tuesday, April 30, 2024 12:47 PM  
**To:** Ducker, Phil <[Phil.Ducker@alston.com](mailto:Phil.Ducker@alston.com)>; IDG.Lenovo.ITC <[IDG.Lenovo.ITC@alston.com](mailto:IDG.Lenovo.ITC@alston.com)>  
**Cc:** [jennifer.dienes@usitc.gov](mailto:jennifer.dienes@usitc.gov); [Service] Lenovo-InterDigital ITC <[ServiceLenovo-InterDigitalITC@fr.com](mailto:ServiceLenovo-InterDigitalITC@fr.com)>  
**Subject:** RE: Inv. No. 337-TA-1373 - De-designation of Non-confidential Portion of Transcript

Thank you Phil.

Sincerely,  
Scott Flanz

Scott M. Flanz  
Principal  
Fish & Richardson P.C.  
Times Square Tower | New York | NY | 10036  
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[scott.flanz@fr.com](mailto:scott.flanz@fr.com)

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**From:** Ducker, Phil <[Phil.Ducker@alston.com](mailto:Phil.Ducker@alston.com)>  
**Sent:** Tuesday, April 30, 2024 12:41 PM  
**To:** Scott Flanz <[flanz@fr.com](mailto:flanz@fr.com)>; IDG.Lenovo.ITC <[IDG.Lenovo.ITC@alston.com](mailto:IDG.Lenovo.ITC@alston.com)>  
**Cc:** [jennifer.dienes@usitc.gov](mailto:jennifer.dienes@usitc.gov); [Service] Lenovo-InterDigital ITC <[ServiceLenovo-InterDigitalITC@fr.com](mailto:ServiceLenovo-InterDigitalITC@fr.com)>  
**Subject:** RE: Inv. No. 337-TA-1373 - De-designation of Non-confidential Portion of Transcript

Scott,

InterDigital does not object to de-designating the following portions of the Reznik and Bordes rough transcripts.

1. Reznik Dep. (Rough) Tr. at 105–10, 130–40
2. Bordes Dep. (Rough) Tr. at 40–50, 75–100, 175–77

Best,

Phil

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**From:** Scott Flanz <[flanz@fr.com](mailto:flanz@fr.com)>  
**Sent:** Monday, April 29, 2024 10:17 AM  
**To:** Ducker, Phil <[Phil.Ducker@alston.com](mailto:Phil.Ducker@alston.com)>; IDG.Lenovo.ITC <[IDG.Lenovo.ITC@alston.com](mailto:IDG.Lenovo.ITC@alston.com)>  
**Cc:** [jennifer.dienes@usitc.gov](mailto:jennifer.dienes@usitc.gov); [Service] Lenovo-InterDigital ITC <[ServiceLenovo-InterDigitalITC@fr.com](mailto:ServiceLenovo-InterDigitalITC@fr.com)>  
**Subject:** RE: Inv. No. 337-TA-1373 - De-designation of Non-confidential Portion of Transcript

**EXTERNAL SENDER – Proceed with caution**

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Phil,

Please confirm that the identified testimony is not confidential information. Otherwise, Respondents intend to raise the issue with the ALJ pursuant to paragraph 10 of the Protective Order as early as tomorrow. Order No. 1 ¶ 10.

Sincerely,  
Scott Flanz

Scott M. Flanz  
Principal  
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---

**From:** Scott Flanz <[flanz@fr.com](mailto:flanz@fr.com)>  
**Sent:** Wednesday, April 24, 2024 11:53 AM  
**To:** Ducker, Phil <[Phil.Ducker@alston.com](mailto:Phil.Ducker@alston.com)>; IDG.Lenovo.ITC <[IDG.Lenovo.ITC@alston.com](mailto:IDG.Lenovo.ITC@alston.com)>  
**Cc:** [jennifer.dienes@usitc.gov](mailto:jennifer.dienes@usitc.gov); [Service] Lenovo-InterDigital ITC <[ServiceLenovo-InterDigitalITC@fr.com](mailto:ServiceLenovo-InterDigitalITC@fr.com)>  
**Subject:** RE: Inv. No. 337-TA-1373 - De-designation of Non-confidential Portion of Transcript

Phil,

We have not heard from you regarding the designation request below. The 10-day period has long passed. Please confirm by this Friday that the identified testimony is not confidential information.

Sincerely,  
Scott Flanz

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Principal  
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[scott.flanz@fr.com](mailto:scott.flanz@fr.com)

---

**From:** Ducker, Phil <[Phil.Ducker@alston.com](mailto:Phil.Ducker@alston.com)>  
**Sent:** Thursday, March 21, 2024 12:37 PM  
**To:** Scott Flanz <[flanz@fr.com](mailto:flanz@fr.com)>; IDG.Lenovo.ITC <[IDG.Lenovo.ITC@alston.com](mailto:IDG.Lenovo.ITC@alston.com)>  
**Cc:** [jennifer.dienes@usitc.gov](mailto:jennifer.dienes@usitc.gov); [Service] Lenovo-InterDigital ITC <[ServiceLenovo-InterDigitalITC@fr.com](mailto:ServiceLenovo-InterDigitalITC@fr.com)>  
**Subject:** RE: Inv. No. 337-TA-1373 - De-designation of Non-confidential Portion of Transcript

[This email originated outside of F&R.]

Scott,

Pursuant to Paragraph 10 of Order No. 1 in this Investigation, we will let you know what InterDigital agrees can be de-designated within 10 days. In the meantime, InterDigital designates the entirety of the transcripts as Confidential Business Information, Subject to Protective Order.

Best,

Phil

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**From:** Scott Flanz <[flanz@fr.com](mailto:flanz@fr.com)>  
**Sent:** Thursday, March 21, 2024 7:11 AM  
**To:** IDG.Lenovo.ITC <[IDG.Lenovo.ITC@alston.com](mailto:IDG.Lenovo.ITC@alston.com)>  
**Cc:** [jennifer.dienes@usitc.gov](mailto:jennifer.dienes@usitc.gov); [Service] Lenovo-InterDigital ITC <[ServiceLenovo-InterDigitalITC@fr.com](mailto:ServiceLenovo-InterDigitalITC@fr.com)>  
**Subject:** Inv. No. 337-TA-1373 - De-designation of Non-confidential Portion of Transcript

**EXTERNAL SENDER – Proceed with caution**

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Counsel:

Respondents intend to de-designate the following portions of the deposition transcripts of Messers. Reznik and Bordes. Please confirm that there is no InterDigital confidential business information in these portions by Friday, March 22.

3. Reznik Dep. (Rough) Tr. at 105–10, 130–40
4. Bordes Dep. (Rough) Tr. at 40–50, 75–100, 175–77

Sincerely,  
Scott Flanz

**Scott M. Flanz**  
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**Fish & Richardson P.C.**  
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